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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA AT LOS ANGELES**

LORENA SANDOVAL, individually and
as successor-in-interest to OSCAR
SANDOVAL, DECEDENT; ISABEL
SANDOVAL, a minor by her Guardian
Ad Litem LORENA SANDOVAL

Plaintiffs,

vs.

CITY OF LOS ANGELES; LOS
ANGELES POLICE DEPARTMENT;
POLICE CHIEF MICHAEL MOORE,
POLICE OFFICER MATT MATZKIN;
POLICE OFFICER STEVE NORRIS;
POLICE OFFICER PETER TULAGAN;
POLICE OFFICER ALVARADO
CARLOS; and DOES 1-100, Inclusive,
Defendants.

Case No.: 18CV10715

COMPLAINT FOR DAMAGES

1. VIOLATION OF TITLE 42,
UNITED STATES CODE,
SECTION 1983 – EXCESSIVE
FORCE
2. VIOLATION OF TITLE 42,
UNITED STATES CODE,
SECTION 1983 – ILLEGAL
SEARCH AND SEIZURE
3. NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS
4. BATTERY (Wrongful Death)
5. NEGLIGENCE (Wrongful
Death)

DEMAND FOR JURY TRIAL

1 **FEDERAL COMPLAINT WITH JURY DEMAND**

2 NOW COMES the above-named Plaintiffs LORENA SANDOVAL,
3 individually and as successor-in-interest to OSCAR SANDOVAL,
4 DECEDENT; ISABEL SANDOVAL, a minor by her Guardian Ad Litem
5 LORENA SANDOVAL, and successor-in-interest, by and through attorney
6 Raymond D. McElfish, Esq., and for the causes of action against the above-
7 named Defendants, Plaintiff alleges and shows claims for relief as follows:

8 1. This is a federal civil rights action under the Fourth and
9 Fourteenth Amendments to the Constitution of the United States and Title
10 42 of the United States Code, Section 1983. Plaintiff brings this action to
11 obtain compensatory damages, punitive damages, attorney's fees and
12 costs, and equitable relief for the serious personal injuries resulting in the
13 death of Oscar Sandoval, who was unlawfully subjected to excessive force
14 when he was shot and killed December 30, 2017 by Defendants, POLICE
15 OFFICER MATT MATZKIN; POLICE OFFICER STEVE NORRIS;
16 POLICE OFFICER PETER TULAGAN; POLICE OFFICER ALVARADO
17 CARLOS. The conduct of the Defendants and the constitutional violations
18 suffered by Oscar Sandoval, occurred as a direct result of the
19 unconstitutional policies of the LOS ANGELES Police Department, LOS
20 ANGELES, California, and their agents.

21
22 **JURISDICTION**

23 2. This action arises under the Fourth and Fourteenth Amendments of
24 the United States Constitution and Title 42 of the United States Code,
25 Section 1983. Jurisdiction of this Court is conferred by Title 28 of the United
26 States Code, Sections 1331 and 1343(a)(3) and (4). This Court has
27 supplemental jurisdiction over Plaintiff's claims arising under state law
28 pursuant to 28 U.S.C. §1367(a), because those claims are so related to the

1 federal claims that they form part of the same case or controversy under
2 Article III of the United States Constitution.

3
4 **VENUE**

5 3. The Central District of California is the proper federal venue for
6 this action, pursuant to title 28 of the United States Code, Section 1391 (b)
7 because it is the judicial district where the constitutional rights violations of
8 Oscar Sandoval were committed.

9
10 **PARTIES**

11 4. That Oscar Sandoval (DECEDENT) at all times material hereto,
12 was a permanent resident of the City of Winnetka, State of California and
13 had attained the age of majority.

14 5. That LORENA SANDOVAL, the wife of Oscar Sandoval, is a
15 resident of City of Winnetka, California. LORENA SANDOVAL sues both
16 in her individual capacity as the mother of DECEDENT, and in a
17 representative capacity as a successor-in-interest to DECEDENT
18 pursuant to California Code of Civil Procedure §377.60. LORENA
19 SANDOVAL seeks both survival and wrongful death damages under
20 federal and state law.

21 6. That ISABEL SANDOVAL, the biological daughter of
22 DECEDENT Oscar Sandoval, a minor, and successor in interest, is a
23 resident of the City of Winnetka. LORENA SANDOVAL stands as the
24 GUARDIAN AD LITEM for minor ISABEL SANDOVAL.

25 7. That Defendant, CITY OF LOS ANGELES ("LOS ANGELES"), at
26 all times material hereto, is and was a municipal corporation, organized
27 and existing under the laws of the State of California, whose principal
28 offices are located at 200 North Spring Street, Los Angeles, CA 90012.

1 LOS ANGELES is responsible for the actions, omissions, policies,
2 procedures, practices, and customs, of its various agents and agencies.
3 It is also a governmental agency responsible for the actions of its
4 subdivision, Defendant, LOS ANGELES POLICE DEPARTMENT
5 ("LAPD"), and its agents and employees. At all times material hereto,
6 Defendant LOS ANGELES was responsible for assuring the actions,
7 omissions, policies, procedures, practices and customs of the LAPD and
8 its employees and agents complied with the laws of the United States and
9 the State of California. At all relevant times, LOS ANGELES was the
10 employer of DOES 1-100.

11 8. That Defendants, POLICE CHIEF, MICHAEL MOORE
12 ("MOORE"), POLICE OFFICER MATT MATZKIN; POLICE OFFICER
13 STEVE NORRIS; POLICE OFFICER PETER TULAGAN; POLICE
14 OFFICER ALVARADO CARLOS ("OFFICERS") and DOES 1-100,
15 Inclusive, at all times material hereto, were adult residents of the State of
16 California, and were employees of the Defendants, LAPD and LOS
17 ANGELES. That at all times material hereto Defendants, MOORE,
18 OFFICERS, and DOES 1-100, Inclusive, were acting under color of state
19 law, were carrying out their duties as officers for Defendant, LAPD, as
20 employees, and were acting within the course and scope of their
21 employment with Defendant, LOS ANGELES. At all times material herein,
22 Defendants MOORE and OFFICERS were acting with the complete
23 authority and ratification of their principal Defendant LOS ANGELES. They
24 are being sued in their official and individual capacities.

25 9. The true names and capacities, whether individual, corporate,
26 associate, or otherwise of Defendants, DOES 1-100, Inclusive, are at this
27 time unknown to Plaintiffs who therefore sue said Defendants by such
28 fictitious names. Plaintiffs are informed and believe and thereon allege

1 that each of the Defendants designated herein by a fictitious name is in
2 some way negligent or responsible for the events and happenings herein
3 referred to which proximately resulted in those injuries and damages to
4 the Plaintiffs. as herein alleged.

5 10. Plaintiffs are informed and believe, and upon such information
6 and belief, allege that at all times herein mentioned, Defendants, and
7 each of them, were acting as the agents, servants, and/or employees of
8 the other named Defendants, and were within the course and scope of
9 their employment and with the full knowledge and consent of each of the
10 other named Defendants. At all times mentioned herein, each and every
11 Defendant had the legal duty to oversee and supervise the hiring,
12 conduct, and employment of each and every Defendant. Each Defendant
13 subsequently ratified and condoned the conduct of each remaining
14 Defendants.

15 16 **GENERAL ALLEGATIONS**

17 11. Plaintiffs LORENA SANDOVAL and ISABEL SANDOVAL
18 repeats and re-alleges each and every allegation in paragraphs 1 through
19 10 of this Complaint with the same force and effect as if fully set forth
20 herein.

21 12. That on December 30, 2017 at approximately 7:20 P.M.
22 Defendant OFFICERS, of the Topanga Division of the LAPD and Gang
23 Enforcement Detail officers were sent to 6900 Oakdale Avenue, Winnetka,
24 California, having been dispatched after a call was made to the LAPD
25 regarding a domestic disturbance.

26 13. At all relevant times DECEDENT did not pose a threat of death
27 to himself or to anyone else including Defendant OFFICERS, and other
28 officers on the scene, DOES 1-100.

1 14. That Defendants, POLICE OFFICER MATT MATZKIN; POLICE
2 OFFICER STEVE NORRIS; POLICE OFFICER PETER TULAGAN;
3 POLICE OFFICER ALVARADO CARLOS, and DOES 1-100, repeatedly
4 shot at Oscar Sandoval, killing him on the scene. Defendants, OFFICERS
5 contend that Oscar Sandoval had a weapon and discharged it toward
6 officers. There is no evidence of any weapon being used by Oscar
7 Sandoval, towards officers.

8 15. That Defendants, POLICE OFFICER MATT MATZKIN; POLICE
9 OFFICER STEVE NORRIS; POLICE OFFICER PETER TULAGAN;
10 POLICE OFFICER ALVARADO CARLOS OSKOVICH, and DOES 1-100,
11 never had any crisis intervention training.

12 16. That the LAPD, on December 30, 2017, had no training program,
13 or had an ineffective training program, for crisis intervention.

14 17. That the Defendant, MOORE, did or should have known that the
15 first responding police officers lacked sufficient training and experience
16 with persons with mental illness.

17 18. Plaintiffs LORENA SANDOVAL, and ISABEL SANDOVAL are
18 DECEDENT'S successors-in-interest as defined by Section 377.11 of the
19 California Code of Civil Procedure and succeeds to DECEDENT'S interest
20 in this action as the wife and daughter of DECEDENT.

21 19. Plaintiffs incurred funeral and burial expenses as a result of
22 Defendants' misconduct. Plaintiffs relied on the DECEDENT for
23 sustenance and financial support.

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CUSTOM, PRACTICE AND POLICY

20. The unconstitutional acts and/or omissions of the individual police officer(s), on information and belief, were pursuant to the following customs, policies, practices and/or procedures of the Defendants, LOS ANGELES and LAPD and its police chief, Defendant, MOORE, as follows:

- a. To use, tolerate or instruct the use of excessive and/or unjustified force;
- b. To engage in or tolerate unreasonable seizures and restraints;
- c. To fail to institute, require, and enforce proper and adequate training, supervision, policies, and procedures concerning, stops, arrests, and the use of force, including but not limited to discharging a weapon;
- d. To fail to use appropriate and generally accepted law enforcement procedures for handling mentally ill and/or emotionally disturbed people, such as Oscar Sandoval;
- e. To fail to institute, require, and enforce proper and adequate training, supervision, policies and procedures concerning handling mentally ill and/or emotionally disturbed people, such as Oscar Sandoval;
- f. To hide or cover up violations of constitutional rights by any of the following:
 - i. By failing to properly investigate and/or evaluate complaints or incidents of excessive or unreasonable force, unlawful seizures and/or concerning handling mentally ill and/or emotionally disturbed people, such as Oscar Sandoval;
 - ii. By ignoring and/or failing to properly investigate and/or discipline unconstitutional or unlawful law enforcement activity; and
 - iii. By allowing, tolerating, and/or encouraging law enforcement officers to fail to file complete and accurate reports; file false

1 reports; make false statements; collude in report writing; and/or
2 obstruct or interfere with investigations of unconstitutional or
3 unlawful law enforcement conduct by withholding and/or
4 concealing material information; and

- 5 iv. To allow, tolerate, and/or encourage a 'code of silence' among
6 law enforcement officers and police department personnel,
7 whereby an officer or member of the police department does
8 not provide adverse information against a fellow or member of
9 the department;

10 21. Defendants, LOS ANGELES, LAPD and MOORE, failed to
11 properly hire, train, instruct, monitor, supervise, evaluate, investigate, and
12 discipline the individual officer(s) involved herein, with deliberate
13 indifference to Oscar Sandoval's constitutional rights;

14 22. Defendants, LOS ANGELES and LAPD, had and were using
15 improper training and techniques for subduing individual suspected of
16 felony crimes.

17 23. It is the custom, practice and policy of Defendants, LOS
18 ANGELES, LAPD and MOORE, and DOES 1 – 100, Inclusive, to
19 inadequately and improperly investigate complaints of police misconduct,
20 thereby directly and/or indirectly endorsing and encouraging such actions.

21 24. Plaintiff is informed and believes that, despite numerous
22 complaints that Defendants, LOS ANGELES and LAPD, officers were
23 using excessive force upon citizens, Defendant, MOORE, has not properly
24 investigated or disciplined officers based upon a citizen's complaint of
25 excessive force. This custom, practice and/or policy condones, ratifies,
26 supports and encourages the improper, unnecessary, and/or excessive
27 use of force by officers employed by Defendants, LOS ANGELES and
28 LAPD, and under Defendant, MOORE's command.

1 25. Plaintiff is informed and believes it is the custom, practice and/or
 2 policy of Defendants, LOS ANGELES, LAPD and MOORE, and DOES 1-
 3 100, Inclusive, not to monitor or track the number of times officers under
 4 its/his command are accused of using excessive force. They do not keep
 5 statistics on individual officers. This custom, practice and/or policy
 6 condones, ratifies, supports and encourages the improper, unnecessary,
 7 and/or excessive use of force by Defendants, LOS ANGELES and LAPD,
 8 officers under Defendant, MOORE's, command.

9 26. Notwithstanding knowledge on the part of Defendants, LOS
 10 ANGELES, LAPD and MOORE, that their officer(s) injured and killed
 11 Oscar Sandoval, and violated his rights by engaging in the activities
 12 alleged above, Defendants, LOS ANGELES, LAPD and MOORE, have
 13 expressed an affirmative agreement with the individual Defendants,
 14 POLICE OFFICER MATT MATZKIN; POLICE OFFICER STEVE
 15 NORRIS; POLICE OFFICER PETER TULAGAN; POLICE OFFICER
 16 ALVARADO CARLOS BOSKVITCH, and DOES 1-100, Inclusive, actions
 17 and have ratified the unconstitutional and unlawful acts by the individual
 18 Defendant officers.

19 20 **CLAIMS PROCEDURE**

21 27. Plaintiff has made the necessary claims pursuant to California
 22 *Government Code* Section 910, to preserve the state causes of action set
 23 forth below.

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CAUSES OF ACTION

FIRST CAUSE OF ACTION

VIOLATION OF TITLE 42, UNITED STATES CODE, SECTION 1983

– EXCESSIVE FORCE

(Against ALL Defendants and DOES 1 – 100, Inclusive)

28. Plaintiff restates, re-alleges and incorporates herein by reference, each and every allegation contained in paragraphs 1 through 27 as though fully set forth herein.

29. That Oscar Sandoval has a constitutionally protected right, pursuant to the Fourth and Fourteenth Amendments to the United States Constitution, not to be unlawfully, detained, arrested, shot and killed.

30. That as set forth in the preceding paragraphs, these Defendants, POLICE OFFICER MATT MATZKIN; POLICE OFFICER STEVE NORRIS; POLICE OFFICER PETER TULAGAN; POLICE OFFICER ALVARADO CARLOS BOSKVITCH, and DOES 1-100, unlawfully shot and killed Oscar Sandoval.

31. That the Defendants acted under color of state law, and operated as is their custom and practice in the scope of their employment.

32. That Defendants unlawfully shot and killed OSCAR SANDOVAL, contrary to the Fourth and Fourteenth Amendments to the United States Constitution, and with the use of excessive force.

33. As a proximate result of Defendants' acts or omissions, Oscar Sandoval, was seriously injured after being shot and died as a result of his injuries, on the scene.

34. As a direct and legal result of the acts or omissions, gross negligence, carelessness, recklessness and/or other tortious conduct of Defendants, DOES 1 – 100, Inclusive, and each of them, Plaintiffs suffered

1 and will continue to suffer extreme and severe distress, pain, anguish, and
2 other economic and non-economic damages in amounts to be proved at
3 trial.

4
5 **SECOND CAUSE OF ACTION**
6 **VIOLATION OF TITLE 42, UNITED STATES CODE, SECTION 1983**
7 **– ILLEGAL SEARCH AND SEIZURE**

8 **(Against ALL Defendants and DOES 1 – 100, Inclusive)**

9 35. Plaintiffs restate, re-allege and incorporate herein by reference,
10 each and every allegation contained in paragraphs 1 through 34 as though
11 fully set forth herein.

12 36. That Oscar Sandoval has a constitutionally protected right,
13 pursuant to the Fourth and Fourteenth Amendments to the United States
14 Constitution, not to be unlawfully, detained, arrested, shot and killed.

15 37. That as set forth in the preceding paragraphs, these Defendants,
16 including, POLICE OFFICER MATT MATZKIN; POLICE OFFICER
17 STEVE NORRIS; POLICE OFFICER PETER TULAGAN; POLICE
18 OFFICER ALVARADO CARLOS BOSKVITCH, and DOES 1-100,
19 unlawfully detained, shot and killed Oscar Sandoval.

20 38. That the Defendants acted under color of state law, custom and
21 practice.

22 39. The conduct of the Defendants, and DOES 1-100, Inclusive,
23 deprived Oscar Sandoval of the right to be secure in his person and effects
24 of unreasonable search and seizure as secured by the Fourth Amendment
25 to the Constitution of the United States.

26 40. The Defendants, including DOES 1-100, Inclusive, knowingly
27 and willfully conspired and agreed among themselves to violate Oscar
28 Sandoval's rights.

1 41. As a direct and legal result of the acts or omissions, gross
2 negligence, carelessness, recklessness and/or other tortious conduct of
3 Defendants, DOES 1 – 100, Inclusive, and each of them, Plaintiffs suffered
4 and will continue to suffer extreme and severe distress, pain, anguish, and
5 other economic and non-economic damages in amounts to be proved at
6 trial.

7
8 **THIRD CAUSE OF ACTION**

9 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

10 **(Against ALL Defendants and DOES 1 – 100, Inclusive)**

11 42. Plaintiff restates, re-alleges and incorporates herein by
12 reference, each and every allegation contained in paragraphs 1 through
13 41 as though fully set forth herein.

14 43. The conduct of the Defendants, DOES 1-100, Inclusive, caused
15 Plaintiffs to suffer mental anguish, as well as emotional and physical
16 distress. Defendants are liable for this cause of action for committing a
17 breach and for violating the allegations in paragraphs 1-41 of this
18 Complaint.

19 44. The conduct of the Defendants, DOES 1-100, Inclusive, was so
20 severe and outrageous that as a proximate result, Plaintiffs suffered
21 mental anguish, as well as emotional and physical distress. Plaintiffs have
22 exhibited manifestations of the mental anguish and emotional distress,
23 including, but not limited to, sleeplessness, anxiety, nightmares,
24 ruminating of the events, and/or crying.

25 45. The Defendants, DOES 1-100, Inclusive, and each of them,
26 knowingly and willfully conspired and agreed among themselves to act in
27 such a manner that Plaintiff will be caused to suffer emotional distress.
28

46. As a direct and legal result of the acts or omissions, gross negligence, carelessness, recklessness and/or other tortious conduct of Defendants, DOES 1 – 100, Inclusive, and each of them, Plaintiffs suffered and will continue to suffer extreme and severe distress, pain, anguish, and other economic and non-economic damages in amounts to be proved at trial.

FOURTH CAUSE OF ACTION

BATTERY

(Wrongful Death)

(Against ALL Defendants and DOES 1 – 100, Inclusive)

47. Plaintiff repeats and re-alleges each and every allegation in paragraphs 1 through 46 of this Complaint with the same force and effect as if fully set forth herein.

48. Defendants POLICE OFFICER MATT MATZKIN; POLICE OFFICER STEVE NORRIS; POLICE OFFICER PETER TULAGAN; POLICE OFFICER ALVARADO CARLOS ("OFFICERS") and DOES 1-100, while working as officers for the LAPD, and acting within the course and scope of their duties, intentionally shot DECEDENT multiple times, without warning, and used unreasonable and excessive force against him. As a result of the actions of OFFICERS, and DOES 1-100, DECEDENT suffered severe pain and suffering and ultimately died from his injuries on the scene. DOE OFFICERS had no legal justification for using such force against DECEDENT, and their use of force, while carrying out their duties as police officers was an unreasonable and unprivileged use of force.

49. As a direct and proximate result of the conduct of OFFICERS and DOES 1-100, as alleged above, DECEDENT sustained injuries, died

1 from his injuries and also lost his earning capacity. As a direct and
 2 proximate result of the conduct of OFFICERS and DOES 1-100,
 3 DECEDENT suffered survival damages pursuant to Code of Civil
 4 Procedure Section 377.34.

5 50. LOS ANGELES is vicariously liable for the wrongful acts of
 6 Defendant OFFICERS and DOES 1-100 pursuant to Section 815.2(a) of
 7 the California Government Code, which provides that a public entity is
 8 liable for the injuries caused by its employees within the scope of the
 9 employment if the employees act would subject him or her to liability.

10 51. The conduct of Defendant OFFICERS and DOES 1-100 was
 11 malicious, wanton, oppressive, and accomplished with a conscious
 12 disregard for the rights of Plaintiffs and DECEDENT, entitling Plaintiffs
 13 individually and as successors-in-interest to DECEDENT, an award of
 14 exemplary and punitive damages as to Defendants OFFICERS and DOES
 15 1-100. Plaintiffs bring this claim as successors-in-interest to DECEDENT,
 16 and seek both survival and wrongful death damages under this claim.

17 18 **FIFTH CAUSE OF ACTION**

19 **NEGLIGENCE**

20 **(Wrongful Death)**

21 **(Against ALL Defendants and DOES 1 – 100, Inclusive)**

22 52. Plaintiff repeats and realleges each and every allegation in
 23 paragraphs 1 through 51 of this Complaint with the same force and effect
 24 is if fully set forth herein.

25 53. Police officers, including Defendants, have a duty to use
 26 reasonable care to prevent harm or injury to others. This duty includes
 27 using appropriate tactics, giving appropriate commands, giving warnings,
 28

1 and not using any force unless necessary, using less than lethal options,
2 and only using deadly force as a last resort.

3 54. Defendants DOES 1-100 breached this duty of care. Upon
4 information and belief, the actions and inactions of Defendants DOES 1-
5 100 were negligent and reckless, including but not limited to:

6 (a) Failure to properly and adequately assess the need to detain,
7 arrest, and use of force or deadly force against DECEDENT;

8 (b) The negligent tactics and handling of the situation with
9 DECEDENT, including pre-shooting negligence;

10 (c) The negligent use of force, including deadly force, against
11 DECEDENT;

12 (d) The failure to provide prompt medical care to DECEDENT;

13 (e) The failure to properly train and supervise employees, both
14 professional and non-professional, including OFFICERS and
15 DOES 1-100

16 (f) The failure to ensure that adequate numbers of employees with
17 appropriate education and training were available to meet the
18 needs of and protect the rights of DECEDENT;

19 (g) The negligent handling of evidence and witnesses; and

20 (h) The negligent communication of information during the
21 incident, and failure to warn.

22 55. As a direct and proximate result of Defendants' conduct,
23 including POLICE OFFICER MATT MATZKIN; POLICE OFFICER
24 STEVE NORRIS; POLICE OFFICER PETER TULAGAN; POLICE
25 OFFICER ALVARADO CARLOS, and DOES 1-100 as alleged above,
26 and other undiscovered negligent conduct, DECEDENT was caused to
27 suffer severe pain and suffering and ultimately died. Also as a direct and
28 proximate result of Defendants' conduct as alleged above, Plaintiffs

1 suffered emotional distress and mental anguish. Plaintiffs also have been
2 deprived of life-long love, companionship, comfort, support, society, care
3 and sustenance of DECEDENT and will continue to be so deprived for
4 the remainder of their natural lives.

5 56. LOS ANGELES is vicariously liable for the wrongful acts of
6 DOES 1-100, pursuant to section 815.2(a) of the California Government
7 Code, which provides that a public entity is liable for the injuries caused
8 by its employees within the scope of the employment if the employees act
9 would subject him or her to liability.

10 57. Plaintiff brings this claim as a successor-in-interest to
11 DECEDENT and seeks wrongful death damages under this claim.

12
13 **WHEREFORE**, Plaintiff prays for judgment against Defendants,
14 DOES 1 – 100, Inclusive, and each of them, as follows:

- 15 1. For general damages in an amount which will conform to proof
16 at the time of trial as to Plaintiffs, LORENA SANDOVAL,
17 individually and as and ISABEL SANDOVAL;
- 18 2. Special damages, including past and future medical and other
19 incidental expenses incurred by and on behalf of Plaintiffs,
20 LORENA SANDOVAL, and ISABEL SANDOVAL according to
21 proof at trial;
- 22 3. For funeral and burial expenses, and loss of financial support;
- 23 4. For punitive damages against the individual defendants in an
24 amount to be proven at trial;
- 25 5. For statutory damages;
- 26 6. Costs of suit incurred herein; and
- 27 7. For such other and further relief as the Court may deem just and
28 proper.

1 Dated: December 26, 2018

MCELFISH LAW FIRM

2
3 By: 

4 Raymond D. McElfish, Esq.
5 Tara Heckard-Bryant, Esq.
6 Attorneys for Plaintiffs,
7 LORENA SANDOVAL, and
8 ISABEL SANDOVAL

DEMAND FOR JURY TRIAL

9 Plaintiff hereby demands a trial by jury on all issues which may be tried
10 by a jury.

11
12 Dated: December 26, 2018

MCELFISH LAW FIRM

13
14
15 By: 

16 Raymond D. McElfish, Esq.
17 Tara Heckard-Bryant Esq.
18 Attorneys for Plaintiffs,
19 LORENA SANDOVAL and
20 ISABEL SANDOVAL
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